



99806  
JJN

## State of New Jersey

Christine Todd Whitman  
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.  
Commissioner

NOV 16 1999

Stephen Lo Iacono, Jr.  
Municipal Manager  
Borough of Lodi  
One Memorial Drive  
Lodi, New Jersey 07644

Dear Mr. Lo Iacono Jr.:

This letter is in response to your November 2, 1999 letter to Commissioner Robert C. Shinn Jr. concerning the status of the Napp Technologies, Inc. facility which is located in your borough. The NJDEP acknowledges your concern about the potential environmental and related economic concerns in reference to the re-development efforts in relation to the Napp Technologies, Inc. facility.

The NJDEP would like to respond to your concerns with the following short history and status update of the Napp Technologies, Inc. site. As you are aware, an industrial accident occurred with a resultant explosion and fire at the Napp Technologies, Inc. facility on April 21, 1995. Due to this unfortunate accident, Napp Technologies, Inc. ceased operations triggering the Industrial Site Recovery Act. An initial Site Investigation completed in June of 1997 by Napp Technologies, Inc., which included over 300 soil samples, indicated that the site is contaminated with elevated levels of volatile organic compounds, base neutral organic compounds, metals and polychlorinated biphenyls (PCBs). Additional delineation and subsequent remediation of the contamination detected at the site is required by the Industrial Site Recovery Act. These requirements were outlined in a NJDEP letter to Napp Technologies, Inc. dated October 15, 1997. Currently we are reviewing a Remedial Investigation Workplan (RIW) submitted by Napp Technologies, Inc. on June 30, 1999 which partially addresses the delineation and remediation of the contamination detected on site. Therefore, in response to your question a Remedial Investigation Workplan and not a Remedial Action Workplan has been submitted at this time. Napp Technologies, Inc. has tentatively proposed limited excavation in conjunction with a site wide cap and Deed Notice as a remedial option for the property. The latest report also addresses the issue of potential offsite contaminant migration from Napp Technologies, Inc.

In reference to your concern about the negative effect on the Lodi environment by the Napp Technologies, Inc. facility, I would like to point out that most if not all of the known contamination is located beneath either a layer of asphalt or under a concrete flooring thus limiting the potential for exposure to the nearby residents. This layer of protection would also have limited the extent of contamination which could have potentially left the site during the floodwaters generated by Hurricane Floyd. Additionally, Napp's consultant has informed the NJDEP that the chemical storage tanks which left the site during the flood were all empty at the time of the flood. This is the reason that they were so easily dislodged by the floodwaters. Though the NJDEP feels that Napp site may have had a minimal environmental impact in terms of the contamination leaving the site during the flood, regardless of its source, all floodwaters of this magnitude should be considered both biologically and chemically hazardous with proper precautions taken to minimize their risk to human health and the environment.

Though you have not mentioned the adjacent Hexcel facility the NJDEP would like to inform you, as we did with the former Mayor of Lodi, that the Hexcel facility is also contaminated and contains elevated levels of VOCs and PCBs in both soil and ground water. Due to the elevated levels of VOCs detected in the ground water at the facility this site may in fact be more difficult to remediate than the adjacent Napp Technologies, Inc. site, which may impact the re-development efforts for the whole area. In fact, even though the cleanup at the Hexcel site has been ongoing since 1986, Hexcel's comprehensive remedial plan is still outstanding with a proposed submittal date by Hexcel of December 1, 1999.

SDMS Document

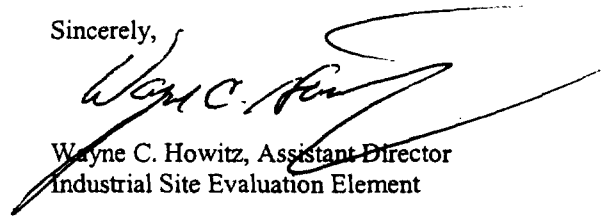


88216

In response to your question regarding Lodi's inability to enforce local ordinances the NJDEP is not aware of any reason why Lodi has not been able to exert their local control on the property. In fact, all industrial establishments completing remedial activities under the auspices of the Industrial Site Recovery Act are required to comply with all federal, state, and local laws, regulations, and ordinances in implementing an approved workplan.

Due to your concerns, the NJDEP staff would gladly meet with you to discuss any additional questions you may have. As it has been over two years since the last official contact between the borough of Lodi and the NJDEP, this meeting could serve to bridge the communication gap which has surfaced over these last two years on these two very important remediation projects. If you would like to set up a meeting or have any questions do not hesitate to call the Case Manager, Joseph J. Nowak at 609-292-0130.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne C. Howitz", is written over a horizontal line.

Wayne C. Howitz, Assistant Director  
Industrial Site Evaluation Element

c: Lodi Mayor and Council  
Assemblywoman Rose M. Heck